



Phone: (718) 971-9474 | **Fax:** (718) 865-0943 | **Email:** Jonathan@ShalomLawNY.com
Office: 105-13 Metropolitan Avenue Forest Hills, New York 11375

January 21, 2021

VIA ECF

United States District Court
Eastern District of New York
Attn: Brian M. Cogan, U.S.D.J.
225 Cadman Plaza East
Courtroom 8D South
Brooklyn, NY 11201-1804

Re: Salamanca, *et al.* v. Sweet Coffee Bakery, Inc., *et al.*
Case No.: 1:20-cv-6223 (BMC)
Consent Letter Motion for Extension of Time to Respond to Complaint

Dear Judge Cogan:

This law firm has been retained to represent Defendants' in the above-referenced matter. Given our recent retention, Defendants' write to respectfully request a sixty (60) day extension of time to respond to the complaint. We respectfully request that the Court set the Defendants' deadline to answer, move, or otherwise respond to the complaint on March 18, 2021.

Plaintiff's counsel has consented to the requested extension, which will permit Defendants' counsel to investigate and the parties to communicate regarding Plaintiff's allegations. Pursuant to § I(E) of this Court's Individual Practices: (i) there have been no previous requests for an extension of time to respond to the complaint; (iv) the adversary consents; (v) there is a previously scheduled telephonic initial status conference scheduled for February 4, 2021, at noon; and (vi) the additional time is sought for your undersigned to investigate the facts alleged in the complaint and to explore early resolution with Plaintiffs, who have agreed to provide damage calculations for Defendants' review.

Additionally, the undersigned respectfully requests that this Court adjourn the scheduled initial conference for a date of its convenience following Defendants' deadline to respond.

Based on the foregoing, Defendants respectfully submit good cause exists for extending Defendants' deadline to respond to the complaint up to and including March 18, 2021.

Dated: Forest Hills, New York
January 21, 2021

Respectfully submitted,

SHALOM LAW, PLLC

/s/ Jonathan Shalom

Jonathan Shalom, Esq.
105-13 Metropolitan Avenue
Forest Hills, NY 11375
Jonathan@ShalomLawNY.com
(718) 971-9474 (office)

Attorneys for Defendants